

Appointment

From: Connolly, Scott [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=73851A5AC82A40A2BC62FA4B13F8F950-SCONNOLL]
Sent: 9/1/2020 10:23:22 PM
To: Connolly, Scott [Connolly.Scott@epa.gov]; Sehgal, Ben@ARB [ben.sehgal@arb.ca.gov]
CC: Lindberg, Jeff@ARB [Jeff.Lindberg@arb.ca.gov]
Subject: SIMS Metal conversations with EPA Region IX enforcement
Location: Microsoft Teams Meeting
Start: 9/2/2020 9:00:00 PM
End: 9/2/2020 10:00:00 PM
Show Time As: Busy

Required Attendees: Connolly, Scott; Sehgal, Ben@ARB
Optional Attendees: Lindberg, Jeff@ARB

Join Microsoft Teams Meeting

Ex. 6 Personal Privacy (PP) United States, San Diego (Toll)

Conference ID: Ex. 6 Personal Privacy (PP)

[Local numbers](#) | [Reset PIN](#) | [Learn more about Teams](#) | [Meeting options](#)

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From: Connolly, Scott
Sent: Tuesday, September 1, 2020 3:22 PM
To: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>
Subject: RE: SIMS Metal conversations with EPA Region IX enforcement

Hi Ben,

Wednesday between 2 and 4 pm is wide open for me. I can send out a teams meeting invite.

I've been splitting my time between SF and up in Placer County and neither the marine layer or afternoon mountain rains have been able to keep the smoke down for long. I've had short spells where I can get out on my bike, but its usually only every couple days...

Best,

Scott

From: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>
Sent: Tuesday, September 1, 2020 3:13 PM
To: Connolly, Scott <Connolly.Scott@epa.gov>
Subject: RE: SIMS Metal conversations with EPA Region IX enforcement

Hi Scott,

Glad to hear from you.
The smoke has me trapped indoors.
The evening delta breezes cannot overcome the haze and smell.
That equates to no bike rides and has me all frustrated....how are you holding up?
Oakland, correct?

These are some available times lots for me to chat:
11am – 1pm @ Wednesday, 9/2/2020
2pm – 4pm @ Wednesday, 9/2/2020
9am – 4pm @ Thursday, 9/3/2020

Take care and be well.
With sincere regards.

Ben Sehgal
District Support Section
California Air Resources Board
916.229.0638



From: Connolly, Scott <Connolly.Scott@epa.gov>
Sent: Tuesday, September 1, 2020 2:51 PM
To: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>
Subject: RE: SIMS Metal conversations with EPA Region IX enforcement

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Ben,

I hope things are going well and that you've been able to avoid the worst of the fires.

I just wanted to check in with you about the status of this work and some of the other items we have had discussions on in the past. Would you have time discuss this week?

Stay safe out there.

Scott

Scott Connolly, Environmental Engineer
Enforcement and Compliance Assurance Division – Air Section
US Environmental Protection Agency, Region 9
connolly.scott@epa.gov | (415) 947-4141
75 Hawthorne St. (ENF-2-1), San Francisco, CA 94105



United States Environmental Protection Agency

From: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>
Sent: Wednesday, June 24, 2020 2:28 PM
To: Connolly, Scott <Connolly.Scott@epa.gov>
Subject: RE: SIMS Metal conversations with EPA Region IX enforcement

Thanks Scott for all your efforts

With sincere regards.

Ben Sehgal
District Support Section
California Air Resources Board
916.229.0638



From: Connolly, Scott <Connolly.Scott@epa.gov>
Sent: Wednesday, June 24, 2020 1:59 PM
To: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>
Subject: RE: SIMS Metal conversations with EPA Region IX enforcement

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Ben,

Per our conversation yesterday, I wanted to follow up with the shareable documents that I mentioned. As I mentioned there are a number of documents that I am unable to share at this time.

If you have any questions or would like to discuss more, please let me know.

Best,

Scott

Scott Connolly, Environmental Engineer
Enforcement and Compliance Assurance Division – Air Section
US Environmental Protection Agency, Region 9
connolly.scott@epa.gov | (415) 947-4141
75 Hawthorne St. (ENF-2-1), San Francisco, CA 94105



United States Environmental Protection Agency

From: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>
Sent: Monday, June 22, 2020 3:24 PM
To: Connolly, Scott <Connolly.Scott@epa.gov>
Subject: RE: SIMS Metal conversations with EPA Region IX enforcement

Already accepted.
Thanks Scott for setting this up.

With sincere regards.

Ben Sehgal
District Support Section
California Air Resources Board
916.229.0638



From: Connolly, Scott <Connolly.Scott@epa.gov>
Sent: Monday, June 22, 2020 3:23 PM
To: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>
Subject: RE: SIMS Metal conversations with EPA Region IX enforcement

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

MS Teams has been working well for past meetings I've had with CARB so lets try that.

I just sent you a link to a meeting invite.

From: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>
Sent: Monday, June 22, 2020 2:58 PM
To: Connolly, Scott <Connolly.Scott@epa.gov>
Subject: RE: SIMS Metal conversations with EPA Region IX enforcement

2 pm please. Thanks Scott.
Teams or Zoom or a phone call. You pick.

With sincere regards.

Ben Sehgal
District Support Section
California Air Resources Board
916.229.0638



From: Connolly, Scott <Connolly.Scott@epa.gov>
Sent: Monday, June 22, 2020 2:56 PM
To: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>
Subject: RE: SIMS Metal conversations with EPA Region IX enforcement

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I'm available at 1 or 2 pm tomorrow, which would you prefer?

From: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>
Sent: Monday, June 22, 2020 2:45 PM
To: Connolly, Scott <Connolly.Scott@epa.gov>
Subject: RE: SIMS Metal conversations with EPA Region IX enforcement

I am all ears! The only call I have is from 10 – 11 am on Tuesday.
Thanks Scott.

With sincere regards.

Ben Sehgal
District Support Section
California Air Resources Board
916.229.0638



From: Connolly, Scott <Connolly.Scott@epa.gov>
Sent: Monday, June 22, 2020 2:43 PM
To: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>
Subject: RE: SIMS Metal conversations with EPA Region IX enforcement

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Do you have time for a call about this tomorrow or later this week? There are a variety of options, that I'm working on.

From: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>
Sent: Monday, June 22, 2020 1:40 PM
To: Connolly, Scott <Connolly.Scott@epa.gov>; Matthew Shaffer <Matthew.Shaffer@dtsc.ca.gov>
Subject: RE: SIMS Metal conversations with EPA Region IX enforcement

If I had my way, I would use 200 tons/hr x 8760 hours/year.
There could be discussion on actual versus potential throughput on calculating emissions.
Give the lack of guidance on the actual permit and absence of enforceability, this discussion on VOC tons/year methodology could go on till the cows return home to the barn!! Lol

So how are we going to address lack of controls @ SIMS?
What BAAQMD or federal rules do we cite?

With sincere regards.

Ben Sehgal
District Support Section
California Air Resources Board
916.229.0638



From: Connolly, Scott <Connolly.Scott@epa.gov>
Sent: Monday, June 22, 2020 1:30 PM
To: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>; Shaffer, Matthew@DTSC <Matthew.Shaffer@dtsc.ca.gov>
Subject: RE: SIMS Metal conversations with EPA Region IX enforcement

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Ben,

I generally agree with your analysis, but I thought it was worth mentioning a few points.

- When calculating potential to emit for Clean Air Act (Part 70) Permitting purposes, we have to use the potential to emit limited by any federally enforceable limits, and we may take into account physical limitations of the technology. In this case the only federally enforceable limit would be the 200 tons/hour shredding rate. In the absence of an maximum hours of operation, we would have to relay on physical or operational limitations.
- My understanding from my review of the facility's operational data, indicates that the 3,778 hours in a year, would not be an unrealistic number and would likely be a operational capacity that the facility could achieve with its current physical and operational design.
- Between 2014 and 2019 Sims has reported to BAAQMD actual total throughput amounts between 258,000 and 371,000 tons per year.

If you would like to discuss more, I'm happy to have a chat about calculation methodology. Just an FYI our phone system is down right now, but if you set up a time a can give you a call on my cell.

Best,

Scott

Scott Connolly, Environmental Engineer
Enforcement and Compliance Assurance Division – Air Section
US Environmental Protection Agency, Region 9
connolly.scott@epa.gov | (415) 947-4141
75 Hawthorne St. (ENF-2-1), San Francisco, CA 94105

From: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>

Sent: Monday, June 22, 2020 10:03 AM

To: Matthew Shaffer <Matthew.Shaffer@dtsc.ca.gov>; Connolly, Scott <Connolly.Scott@epa.gov>

Subject: RE: SIMS Metal conversations with EPA Region IX enforcement

Here is my analysis:

The permitted throughput capacity for SIMS facility is 200 tons/hour with an average production of 358,000 tons/year (based on a January 2018 DTSC survey). The air pollution control (APC) devices serving the shredding operation are a cyclone and a wet scrubber (similar to Schnitzer).

An emission factor (EF) 0.781 lbs VOC/ton was derived from Schnitzer's recent source test. $0.781 \text{ lbs VOC/ton (car bodies) VOC} \times 358,000 \text{ tons/year} = 139.8 \text{ tons VOC/year}$. The estimated potential VOC annual emissions @ SIMS is 140 tpy, which puts it higher than the permit threshold of 100 tons VOC/yr requiring SIMS to file for a Title V permit.

Now, when SIMS does conduct a comprehensive source test, we can expect an EF @ lbs VOC/ton (car bodies, light iron and combined). All I see from the permit is 200 tons/hour throughput. I used DTSC input of 358,000 tons/year just to get an estimate. Potential could easily be double the value.

With sincere regards.

Ben Sehgal
District Support Section
California Air Resources Board
916.229.0638



From: Shaffer, Matthew@DTSC <Matthew.Shaffer@dtsc.ca.gov>

Sent: Monday, June 22, 2020 9:53 AM

To: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>; Connolly, Scott <Connolly.Scott@epa.gov>

Subject: RE: SIMS Metal conversations with EPA Region IX enforcement

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Ben – If I assume that the Sims shredder operates 3,778 hours per year, which is very high, Sims would process 755,600 tons per year at 200 tons per hour. This is about twice as much as DTSC back calculated in the draft report which was based on the disposal of metal shredder residue – see table 6 below.

I used the MassDPE data (attached), the General Iron data, attached, and the North State data, links below. I don't know if the data was collected pre or post air pollution control, but Terminal Island had an explosion that destroyed their air pollution control system the same year that the VOC emission data was collected so I believe that the Terminal Island data is without a VOC removal system.

| Where/Owner | EF (lb VOC/tons material processed) | VOC lb/yr @ 755,600 tons/yr |
|---|-------------------------------------|-----------------------------|
| Institute of Scrap Recycling Industries factor "Title V Applicability Workbook" | 0.00136 | 1,028 |
| Sadoff Iron & Metal, Fond du Lac, WI | 0.213 | 160,943 |
| Miller Compressing, Milwaukee, WI | 0.0168 | 12,694 |
| Toledo Shredding, Toledo Ohio | 0.247 | 186,633 |
| Adams Steel, Anaheim CA | 0.0435 | 32,869 |
| Schnitzer Steel, Oakland CA | 0.02 | 15,112 |
| Sims Hugo, Terminal Island, CA | 0.2058 | 155,502 |
| Omni Source, Jackson, MI | 0.25 | 188,900 |
| Schnitzer Steel, Portland Oregon | 0.03 | 22,668 |
| Schnitzer/Prolerized LPA Application | 0.00136 | 1,028 |
| SA Recycling, Terminal Island CA | 0.1 | 75,560 |
| General Iron | 0.243 | 183,611 |
| NorthState | 0.3955 | 298,840 |
| | Min | 1,028 |
| | Max | 298,840 |
| | Standard Deviation | 93,701 |
| | Median | 75,560 |
| | Average | 102,722 |

<https://dtsc.ca.gov/wp-content/uploads/sites/31/2017/01/Metal-Shredder-Analysis-DRAFT.pdf>

Also, North State seems to be higher, 0.3955 lb VOC per ton.

<https://www.pca.state.mn.us/air/northern-metals-shredder-building-test-results>

<https://www.pca.state.mn.us/sites/default/files/TSD%20-%2014100076-101%20-%202018.pdf>

Thanks,
Matthew



California Department of

Toxic Substances Control

(916) 255-3740

From: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>

Sent: Friday, June 19, 2020 2:05 PM

To: Shaffer, Matthew@DTSC <Matthew.Shaffer@dtsc.ca.gov>; Connolly, Scott <Connolly.Scott@epa.gov>

Subject: RE: SIMS Metal conversations with EPA Region IX enforcement

Thanks Matt.

Scott/Matt: based on 200 tons/hr production limit for SIMS, what is your estimate for SIMS annual VOC emission?
Best guess in tons/year.

Would they be over or below the BAAQMD 100 tons VOC/yr Title V threshold?
Estimate perhaps.

With sincere regards.

Ben Sehgal
District Support Section
California Air Resources Board
916.229.0638




From: Shaffer, Matthew@DTSC <Matthew.Shaffer@dtsc.ca.gov>
Sent: Friday, June 19, 2020 1:56 PM
To: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>; Connolly, Scott <Connolly.Scott@epa.gov>
Subject: RE: SIMS Metal conversations with EPA Region IX enforcement

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Here is the air sampling data from a fire.

Thanks,
Matthew

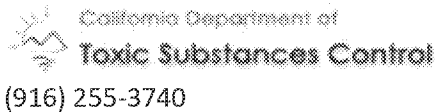
 California Department of
Toxic Substances Control
(916) 255-3740

From: Shaffer, Matthew@DTSC
Sent: Friday, June 19, 2020 1:53 PM
To: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>; Connolly, Scott <Connolly.Scott@epa.gov>
Subject: RE: SIMS Metal conversations with EPA Region IX enforcement

Ben and Scott - Here is the 2014 Emissions Minimization Plan that the industry has fervently argued that it is a plan, not a permit. I also included the board meeting notes where a sims fire was discussed and that air samples were collected. I requested the sampling data and received the data a few months later. I'll send that in a following email.

Thanks,

Matthew



From: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>

Sent: Friday, June 19, 2020 10:16 AM

To: Connolly, Scott <Connolly.Scott@epa.gov>; Shaffer, Matthew@DTSC <Matthew.Shaffer@dtsc.ca.gov>

Subject: RE: SIMS Metal conversations with EPA Region IX enforcement

Thanks Scott.

Could you please send me the recent Sims Redwood City PTO and all annual renewals since 2010 (except 2014 and 2016)?
I figure they would all be weak.

With sincere regards.

Ben Sehgal
District Support Section
California Air Resources Board
916.229.0638



From: Connolly, Scott <Connolly.Scott@epa.gov>

Sent: Friday, June 19, 2020 10:11 AM

To: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>; Shaffer, Matthew@DTSC <Matthew.Shaffer@dtsc.ca.gov>

Subject: RE: SIMS Metal conversations with EPA Region IX enforcement

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Ben,

I do have the most recent Sims Redwood City PTO and all annual renewals since 2010 (except 2014 and 2016, not sure why those are missing). Do you just want the newest one? None of them are particularly comprehensive.

I also have the 2011 source test, this is the most recent test I'm aware of. During my inspection last year, it was stated that this is the last test conducted.

Let me know if you have any questions.

Best,

Scott

Scott Connolly, Environmental Engineer
Enforcement and Compliance Assurance Division – Air Section
US Environmental Protection Agency, Region 9
connolly.scott@epa.gov | (415) 947-4141
75 Hawthorne St. (ENF-2-1), San Francisco, CA 94105



United States Environmental Protection Agency

From: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>
Sent: Friday, June 19, 2020 7:28 AM
To: Connolly, Scott <Connolly.Scott@epa.gov>; Matthew Shaffer <Matthew.Shaffer@dtsc.ca.gov>
Subject: SIMS Metal conversations with EPA Region IX enforcement

Good morning Scott and Matthew.

Do either of you have the SIMS Redwood City permit (issued by BAAQMD) and past source test?
Would you be willing to share these documents? Thanks.

With sincere regards.

Ben Sehgal
District Support Section
California Air Resources Board
916.229.0638



From: Connolly, Scott <Connolly.Scott@epa.gov>
Sent: Wednesday, December 11, 2019 3:04 PM
To: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>; Shaffer, Matthew@DTSC <Matthew.Shaffer@dtsc.ca.gov>
Subject: RE: Schnitzer and SIMS Metal conversations with EPA Region IX enforcement

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Hi Ben and Matthew,

Here is the 114 Information Request that was sent to Sims back in October. I requests a number of records and site specific emissions testing on the shredder.

Let me know if you have any questions.

Scott

Scott Connolly, Environmental Engineer
Enforcement and Compliance Assurance Division – Air Section
US Environmental Protection Agency, Region 9
connolly.scott@epa.gov | (415) 947-4141
75 Hawthorne St. (ENF-2-1), San Francisco, CA 94105



United States Environmental Protection Agency

From: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>
Sent: Wednesday, December 11, 2019 2:16 PM
To: Matthew Shaffer <Matthew.Shaffer@dtsc.ca.gov>
Cc: Connolly, Scott <Connolly.Scott@epa.gov>
Subject: RE: Schnitzer and SIMS Metal conversations with EPA Region IX enforcement

Scott: can you share a copy of the 114 letter with me and Matthew?
Thanks.

I am working with Matthew, DTSC on the Schnitzer case.
This is in official capacity.
Matthew is very interested in SIMS.

Matthew, Scott comes with a bunch of metal shredding experience from Chicago region EPA.

With sincere regards.

Ben Sehgal
District Support Section
California Air Resources Board
916.229.0638




From: Shaffer, Matthew@DTSC <Matthew.Shaffer@dtsc.ca.gov>
Sent: Wednesday, December 11, 2019 1:22 PM
To: Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>
Subject: RE: Schnitzer and SIMS Metal conversations with EPA Region IX enforcement

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ben – can I get a copy of Section 114 letter?

Thanks,
Matthew

 California Department of
Toxic Substances Control
(916) 255-3740